

BGK:TRP
F. #2021R00254

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

21-CR-496 (RJD)(MMH)

ORLANDO SANAY,
KEILY NUNEZ,
KEIMI NUNEZ
MICHAEL PIMENTAL VELOZ
and FANNY PLASENCIA,

Defendants.

The United States of America, by and through BREON PEACE, United States Attorney for the Eastern District of New York, and Tanisha R. Payne, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property pursuant to Fed. R. Crim. P. Rule 7(f).

The above-captioned Indictment filed on September 22, 2021 provided notice of the government's intent to seek forfeiture of property pursuant to Title 18 U.S.C. §§ 981(a)(1)(C), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c) in connection with Counts One through Seven of the Indictment. The United States hereby gives notice to the defendants that the United States is seeking forfeiture of the following additional property:

1. Approximately thirty-nine thousand two hundred eighty-five dollars and zero cents (\$39,285.00) in United States currency seized on or about June 10, 2021 from a residence located on Guy R Brewer Blvd. in Jamaica, New York; and
 2. Approximately three (3) watches seized on or about June 10, 2021 from a residence located on Guy R Brewer Blvd. in Jamaica, New York.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
April 7, 2022

BREON PEACE
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Brooklyn, New York 11201

By: /s/ *Tanisha R. Payne*
Tanisha R. Payne
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To: All Counsel of Record (by ECF)